ANTHONY S MINA 75 E. DOGWOOD TRAIL SOUTHERN SHORES, NC 27949 610 842 3905

chestercountylawn@yahoo.com

March 16, 2025

CASE: APA -25-01

APPLICANT'S MOTION TO PRECLUDE THE MARCH 19, 2025 HEARING AND APPROVE JANUARY 6, 2025 LOT SUBDIVISION APPLICATION BASED ON THE RELEVANT, COMPETENT AND SUBSTANTIAL EVIDENCE OF A \$75,000 CRIMINAL CONSPIRACY INVOLVING WES HASKETT, LAUREN WOMBLE, JAY WHELESS AND THE PLANNING BOARD FRAUDLENTLY MISREPRESENTING ZONING CODE, ILLEGALLY USING TOWN MONEY TO PAY THE ATTORNEYS TO AID THE FRAUD (EMBEZZLEMENT), COMMITTING DISORDERLY CONDUCT, COMMITTING INSURANCE FRAUD AND COMMITTING CRIMES THAT VIOLATE 18 U.S. CODE § 1512-TAMPERING WITH A WITNESS, VICTIM OR AN INFORMANT

I, Applicant Anthony S Mina hereby Motion to Preclude The March 19, 2025 hearing and approve the January 6, 2025 lot subdivision due to Wes Haskett's criminal conspiracy and in support thereof aver the following:

- Applicant Anthony Mina does not have any type of relationship with Wes Haskett, Cliff Ogburn, Southern Shores Town Government, the Hornthal Reilly Ellis and Maland Law Firm, Jay Wheless and the Planning Board/Board of Adjustments members... meaning he is not a friend, colleague, client, partner, student, cooperating witness/informant or any other person besides a Variance Applicant on October 21, 2024, Subdivision Applicant and Southern Shores resident and tax payer.
- 2. When attorney Lauren Womble referred to Wes Haskett's denial of the 75 E Dogwood Trail lot subdivision/Variance as a "Blanket denial" or "Blank-it denial" or "Blanket" at 3:26 of the October 21, 2024 youtube video of the Variance Hearing Applicant did not agree to be a part of a "blank-kit", "blank-it" or "Blanket" scheme with Wes Haskett and Lauren Womble and Wes Haskett would be coercing a labor/human trafficking scheme against Applicant if they claimed the word pronounced "blanket" had a meaning involving a relationship or agreement with Applicant.
- 3. Wes Haskett filed a lot width amendment on March 31, 2023 to prevent future lot subdivisions.
- 4. Town Code Section 36-414-Motion to Amend provides:

(a)The town council may, on its own motion or upon motion or upon petition by any person within any zoning jurisdiction of the town, after public notice and hearing, amend, supplement, change, modify or repeal the regulations herein established or the maps which are part of this chapter, subject to the rules prescribed in this article. No regulation or map shall be amended, supplemented, changed, modified or repealed until after a public hearing in relation thereto, at which parties in interest and citizens shall have an opportunity to be heard. Prior to adopting or rejecting any zoning amendment, the planning board shall adopt a statement describing whether its action is consistent with the adopted town comprehensive land use plan and explaining why the planning board considers the action taken to be reasonable and in the public interest. That statement is not subject to judicial review. A notice of such hearing shall be given one a week for two successive calendar weeks in a newspaper of general circulation in the town, said notice to be published the first time not less than ten days nor more than 25 days prior to the date fixed for the hearing.

(b) In addition and where a zoning map amendment is proposed, the town shall cause to be placed a sign on the subject property announcing the date, time, and place of the public hearing for the purpose of notifying persons of the proposed rezoning.

- 5. Wes Haskett did not place a sign on 75 E Dogwood Trail notifying people of the proposed rezoning of subdividable property to unsubdividable property with his March 31, 2023 zoning amendment.
- 6. Wes Haskett responded to (4) emails from Applicant in May of 2023 asking about the 75 E. Dogwood Trail subdivision and lot width requirements and Wes Haskett refused to tell Applicant about the March 31, 2023 lot width amendment.
- 7. During the month of May, 2023 the previous owner of 75 E Dogwood Trail, Linda Lauby negotiated an additional \$75,000 for a subdividable lot (as proven with Wes Haskett's July 16, 2024 denied lot subdivision with the only reason being the March 31, 2023 lot width amendment) that she would not have received if Wes Haskett was not hiding the March 31, 2023 lot width amendment from Applicant.
- 8. Prior to the March 31, 2023 lot width amendment Wes Haskett discussed the 75 E Dogwood Trail lot subdivision with the previous owner of 75 E Dogwood Trail and her realtor and Wes Haskett was told to "Stay Tuned", then there is no other communication between them on the record.
- 9. Wes Haskett's paid attorney Lauren Womble was quoted in the Southern Shores Beacon stating "We question the Town's decision even to let Mr. Mina file a request for a variance, inasmuch as a variance is not the "appropriate remedy".
- 10. Wes Haskett provided Applicant a Variance Application on November 1, 2023 when Applicant asked how leniency is asked for in Southern Shores and on May 17, 2023 Wes Haskett emailed Applicant and stated "An exception would be in the form of a variance" when asked the proper way to ask Southern Shores to make an exception to their local code.

- 11. The Southern Shores Beacon article and/or Lauren Womble publicly stated Applicant is the cause of a waste of town money for the Variance hearing when the facts are Wes Haskett indicated Applicant should file a Variance Application to ask for his lot subdivision approval.
- 12. On October 14, 2024 Wes Haskett claimed in his VA-24-01 Staff Report "All applicable notification requirements established in N.C.G.S. 160D-601 and in the Town's Zoning Ordinance were satisfied prior to the adoption of the August 3, 2021 Town Code Text Amendment and June 6, 2023 Zoning Ordinance Amendment."
- 13. Wes Haskett's March 31, 2023 lot width amendment (which was the only reason Applicant's July 3, 2024 subdivision Application with "Exhibit A" was denied was scheduled to be heard by the Planning Board on May 15, 2023 and heard by the Planning Board on May 15, 2023.
- 14. Town Code 36-362(b) provides: *Notices*. Notice of hearings conducted pursuant to this article shall be mailed to: (i) the person or entity whose appeal, application, or request is the subject of the hearing; (ii) to the owner of the property that is the subject of the hearing if the owner did not initiate the hearing; (iii) to the owners of all parcels of land abutting the parcel of land that is the subject of the hearing; and (iv) to any other persons entitled to receive notice as provided by this CHAPTER. In the absence of evidence to the contrary, the town may rely on the Dare County tax listing to determine owners of property entitled to mailed notice. The notice must be deposited in the mail at least ten days, but not more than 25 days, prior to the date of the hearing. Within that same time period, the town shall also prominently post a notice of the hearing on the site that is the subject of the hearing or on an adjacent street or highway right-of-way. A true and correct copy of Town Code Section 36-362 governing the Planning Board/Board of Adjustments is attached hereto and marked "Exhibit D of the January 6 subdivision application".
- 15. A Southern Shores Public Records Request Response dated June 20, 2024 states mailed letters were not provided for the May 15, 2023 Planning Board hearing on Wes Haskett's March 31, 2023 lot width amendment and Posted Notice was not placed at 75 E. Dogwood Trail
- 16. On October 30, 2024 Wes Haskett responded to a Southern Shores Public Records Request for proof of notification pursuant to Town Code 36-362(b) for the May 15, 2023 Planning Board meeting and WES HASKETT FALSELY CLAIMED "The Planning Board did not hold a hearing for TCA-21-06 on July 19, 2021 or ZTA-23-03 on May 15, 2023 because no hearings were required (hearings were subsequently required and held by the Town Council). There also was no posted or mailed notices for the Planning Board's consideration of TCA-21-06 on July 19, 2021 and ZTA-23-03 on May 15, 2023 because they weren't required
- 17. **THE TRUTH IS** Wes Haskett knows the Planning Board heard his March 31, 2023 lot width amendment on May 15, 2023 pursuant to Town Code 36-415 and recommended approval because Wes Haskett emailed Applicant on June 1, 2023 and stated "...we have been discussing amending our current lot width requirements. The Town Planning Board recommended approval of the attached amendments on May 15th and Town Council will be holding a public hearing on June 6th.
- 18. **UNFORTUNATELY FOR WES HASKETT'S FALSE STATEMENTS,** the June 6, 2023 Town Council meeting minutes state "The Planning Board recommended approval of the application (4-1) at the May 15, 2023 Planning Board Meeting

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- WES HASKETT MADE A FALSE REPORT TO LAW ENFORCEMENT ON MAY 21, 2024 IN VIOLATION OF N.C.G.S. 14-225 claiming he had a legal basis to amend zoning code on June 6, 2023 at 75 E. Dogwood Trail but, WES HASKETT FRAUDULENTLY DELETED TOWN CODE NOTIFICATION REQUIREMENTS AT SECTION 36-414(b) AND OMITTED NOTIFICATION REQUIREMENTS AT TOWN CODE 36-362(b)
- 20. WES HASKETT'S ABUSE OF ZONING CODES (IN A MANNER DIFFERENT THAN ENFORCMENT AGAINST OTHER PROPERTY OWNERS) IS A CONTINUING PATTERN OF CORRUPTION PROVING WES HASKETT HAS AN UNDISCLOSED SPECIAL INTEREST IN 75 E DOGWOOD TRAIL.
- 21. Wes Haskett signed a plat at 172 Ocean Boulevard and a plat at 233 N. Dogwood Trail that did not meet setback and/or lot width requirements but Wes Haskett is harassing Applicant with a lot width amendment at 75 E. Dogwood Trail that has never been effectuated at 75 E. Dogwood Trail with notification prior to a hearing and also was harassing Applicant with a set back encroachment claim for months until Applicant filed a building permit to remove Wes Haskett's claimed setback encroachment (Wes Haskett said the setback encroachment no longer prevented the subdivision one day after Applicant filed a building permit to remove 1' of his house
- 22. WES HASKETT CLAIMED 233 N. DOGWOOD TRAIL AND THE 0 DOGWOOD TRAIL
 ADJACENT LOTS WERE CREATED PRIOR TO THE TOWN'S INCORPORATION IN 1979 BUT
 A SECOND PUBLIC RECORDS REQUEST PROVED WES HASKETT SIGNED THE PLAT ON
 7-21-16 WHICH DID NOT MEET LOT WIDTH REQUIREMENTS.
- 23. Wes Haskett's refusal to correct his wrong doing in his subdivision application denials using unenforceable zoning codes prove Wes Haskett's illegal special interest in 75 E Dogwood Trail that he fraudulently demonstrated in May of 2023 when hiding the lot width amendment Haskett used to deny the subdivision as the previous owner Linda Lauby negotiated an additional \$75,000 from Applicant for a lot that was subdividable.
- 24. Jay Wheless would not allow Applicant to testify to his Federal Law Suit during the October 21, 2024 Variance Hearing and stated the law suit would be a part of the record and would be a preserved for Appeals. See you tube video 2:09-2:11.
- 25. Dare County Superior Court Ordered Wes Haskett and Southern Shores to provide a complete verified record from the Variance hearing within 30 days of December 18, 2024.
- 26. Despite Southern Shores and Town Council being served by U.S. Mail with electronic receipt of service and the Planning Board being served by email the Order dated December 18, 2024, Wes Haskett, Southern Shores and/or the Planning Board are in Contempt of Dare County Superior Court's Order requiring a complete copy of the record from the Variance hearing VA-24-01.
- 27. On October 21, 2024 Lauren Womble misrepresented Town Code 36-414(b) by removing the 1st 3 words from the code and claimed the code does not apply to text amendments. See youtube video 1:42-1:44.
- 28. On October 21, 2024 Lauren Womble argued Wes Haskett's statement that notification requirements were met in his staff report was not cross examinable when Town Code 36-414(b) was stated by Applicant. See youtube video 3:24-3:29.

- 29. On October 21, 2024 Lauren Womble again claimed notification requirements were met and also claimed the use of 75 E Dogwood Trail was not changed when Wes Haskett's email dated June 7, 2023 indicated the lot width requirement was adopted to prevent future subdivisions (Wes Haskett's June 1, 2023 email proves Wes Haskett knew the new lot width requirement prevented the 75 E Dogwood Trail subdivision. See youtube video 3:48-3:51.
- 30. On October 21, 2024 Lauren Womble claimed the zoning ordinances Applicant was seeking a variance from, which did not have posted notice pursuant to Town Code 36-414(b) prior to their adoption were "valid, legal, enforceable laws". See youtube video 5:09-5:11.
- 31. On October 21, 2024 Jay Wheless and Wes Haskett misrepresented Town Code 36-414(b)'s posted notice requirements which requires posted notice when Town Code 36-414(a) is used to amend code, regardless of whether a map amendment is made. See you tube video 3:09-3:12.
- 32. On October 21, 2024 Jay Wheless misrepresented Town Code 36-414(b) again to pretend notification requirements were met. See youtube video 3:48-3:51.
- 33. Paragraph 1 of the Code of Ethics provides: I will always obey the law and will not try in any way to influence the application of the law by any of the town's authorities or personnel.

Paragraph 2 of the Code of Ethics provides: I will always uphold the integrity and independence of my job.

Paragraph 3 of the Code of Ethics provides: I will always avoid any impropriety in all of my activities.

Paragraph 4 of the Code of Ethics provides: I will manage and spend the town's funds as if they were my own and will have the best interests of all Southern Shores taxpayers in mind in the expenditure of these funds.

Paragraph 7 of the Code of Ethics provides: I will always respond promptly to any concern brought to me by any employee or Town resident. In this regard I will grant no special consideration, treatment or advantage to any citizen beyond that which is available to any other citizen.

- 34. Andy Ward agreed the Code of Ethics would be complied with at the October 21, 2024 Variance Hearing.
- 35. On October 21, 2024 when Applicant objected to Jay Wheless and Lauren Womble misrepresenting zoning code 36-414(b) and stated they were colluding Andy Ward stated to Applicant "you are not helping your case, you are accusing the whole town of impropriety". See youtube video 3:26-3:29.
- 36. Andy Ward misrepresented Town Code 36-414(b) at youtube video 4:27 by claiming the code only applies to map amendments.
- 37. Andy Ward signed an Order denying Applicant's Variance on November 19, 2024 that stated at #12 "There has been no competent evidence presented to support Applicant's motion to preclude. There is no evidence of fraud, criminal conspiracy or misconduct by the staff".
- 38. The Code of Ethics prohibits Southern Shores money from being spent on HREM law firm, as their fraudulent misrepresentations violate Town Code #1, 2, 3, 4 and 7.

39. Rule4.1 OF THE RULES OF PROFESSIONAL CONDUCT STATES: TRUTHFULNESS IN STATEMENTS TO OTHERS: In the course of representing a client a lawyer shall not knowingly make a false statement of material fact or law to a third person.

Misrepresentation

[1] A lawyer is required to be truthful when dealing with others on a client's behalf, but generally has no affirmative duty to inform an opposing party of relevant facts. A misrepresentation can occur if the lawyer incorporates or affirms a statement of another person that the lawyer knows is false. Misrepresentations can also occur by partially true but misleading statements or omissions that are the equivalent of affirmative false statements. For dishonest conduct that does not amount to a false statement or for misrepresentations by a lawyer other than in the course of representing a client, see Rule 8.4.

Statements of Fact

[2] This Rule refers to statements of fact. Whether a particular statement should be regarded as one of fact can depend on the circumstances. Under generally accepted conventions in negotiation, certain types of statements ordinarily are not taken as statements of material fact. Estimates of price or value placed on the subject of a transaction and a party's intentions as to an acceptable settlement of a claim are ordinarily in this category, and so is the existence of an undisclosed principal except where nondisclosure of the principal would constitute fraud. Lawyers should be mindful of their obligations under applicable law to avoid criminal and tortious misrepresentation.

Crime or Fraud by Client

- [3] Under Rule 1.2(d), a lawyer is prohibited from counseling or assisting a client in conduct that the lawyer knows is criminal or fraudulent. Ordinarily, a lawyer can avoid assisting a client's crime or fraud by withdrawing from the representation. Sometimes it may be necessary for the lawyer to give notice of the fact of withdrawal and to disaffirm an opinion, document, affirmation or the like. In extreme cases, substantive law may require a lawyer to disclose information relating to the representation to avoid being deemed to have assisted the client's crime or fraud. Rule 1.6(b)(1) permits a lawyer to disclose information when required by law. Similarly, Rule 1.6(b)(4) permits a lawyer to disclose information when necessary to prevent, mitigate, or rectify the consequences of a client's criminal or fraudulent act in the commission of which the lawyer's services were used.
 - 40. Rule 4.1 Of The Rules Of Professional Conduct prohibit Jay Wheless and HREM Law Firm's conduct.
 - 41. 18 U.S. Code § 1512 Tampering with a witness, victim, or an informant provides: (a)
 - (1) Whoever kills or attempts to kill another person, with intent to—
 - (A)prevent the attendance or testimony of any person in an official proceeding;
 - (D) prevent the production of a record, document, or other object, in an official proceeding;

- **(C)**prevent the communication by any person to a law enforcement officer or judge of the United States of information relating to the commission or possible commission of a Federal offense or a violation of conditions of probation, parole, or release pending judicial proceedings; shall be punished as provided in paragraph (3).
- (2)Whoever uses physical force or the threat of physical force against any person, or attempts to do so, with intent to—
- (A)influence, delay, or prevent the testimony of any person in an official proceeding;
- (B) cause or induce any person to-
- (i)withhold testimony, or withhold a record, document, or other object, from an official proceeding;
- (ii)alter, destroy, mutilate, or conceal an object with intent to impair the integrity or availability of the object for use in an official proceeding;
- (iii)evade legal process summoning that person to appear as a witness, or to produce a record, document, or other object, in an official proceeding; or
- (iv)be absent from an official proceeding to which that person has been summoned by legal process; or
- (C)hinder, delay, or prevent the communication to a law enforcement officer or judge of the United States of information relating to the commission or possible commission of a Federal offense or a violation of conditions of probation, supervised release, parole, or release pending judicial proceedings; shall be punished as provided in paragraph (3).(3)The punishment for an offense under this subsection is—
- (A)in the case of a killing, the punishment provided in sections 1111 and 1112;
- (B)in the case of-
- (i)an attempt to murder; or
- (ii)the use or attempted use of physical force against any person; imprisonment for not more than 30 years; and
- **(C)**in the case of the threat of use of physical force against any person, imprisonment for not more than 20 years.
- **(b)**Whoever knowingly uses intimidation, threatens, or corruptly persuades another person, or attempts to do so, or engages in misleading conduct toward another person, with intent to—
- (1)influence, delay, or prevent the testimony of any person in an official proceeding;
- (2)cause or induce any person to-
- (A)withhold testimony, or withhold a record, document, or other object, from an official proceeding
- **(B)**alter, destroy, mutilate, or conceal an object with intent to impair the object's integrity or availability for use in an official proceeding;
- **(C)**evade legal process summoning that person to appear as a witness, or to produce a record, document, or other object, in an official proceeding; or
- **(D)**be absent from an official proceeding to which such person has been summoned by legal process; or
- (3)hinder, delay, or prevent the communication to a law enforcement officer or judge of the United States of information relating to the commission or possible commission of a

Federal offense or a violation of conditions of probation [1] supervised release,,[1] parole, or release pending judicial proceedings;

shall be fined under this title or imprisoned not more than 20 years, or both.

(c)Whoever corruptly—

- (1)alters, destroys, mutilates, or conceals a record, document, or other object, or attempts to do so, with the intent to impair the object's integrity or availability for use in an official proceeding; or
- (2)otherwise obstructs, influences, or impedes any official proceeding, or attempts to do so, shall be fined under this title or imprisoned not more than 20 years, or both.(d)Whoever intentionally harasses another person and thereby hinders, delays, prevents, or dissuades any person from—
- (1) attending or testifying in an official proceeding;
- (2)reporting to a law enforcement officer or judge of the United States the commission or possible commission of a Federal offense or a violation of conditions of probation ¹ supervised release,, ¹ parole, or release pending judicial proceedings;
- (3)arresting or seeking the arrest of another person in connection with a Federal offense; or (4)causing a criminal prosecution, or a parole or probation revocation proceeding, to be sought or instituted, or assisting in such prosecution or proceeding; or attempts to do so, shall be fined under this title or imprisoned not more than 3 years, or both.
- (e)In a prosecution for an offense under this section, it is an affirmative defense, as to which the defendant has the burden of proof by a preponderance of the evidence, that the conduct consisted solely of lawful conduct and that the defendant's sole intention was to encourage, induce, or cause the other person to testify truthfully.
- (f)For the purposes of this section—
- (1)an official proceeding need not be pending or about to be instituted at the time of the offense; and
- (6) the testimony, or the record, document, or other object need not be admissible in evidence or free of a claim of privilege.
- (7) (g)In a prosecution for an offense under this section, no state of mind need be proved with respect to the circumstance—
- (1) that the official proceeding before a judge, court, magistrate judge, grand jury, or government agency is before a judge or court of the United States, a United States magistrate judge, a bankruptcy judge, a Federal grand jury, or a Federal Government agency; or
- (2)that the judge is a judge of the United States or that the law enforcement officer is an officer or employee of the Federal Government or a person authorized to act for or on behalf of the Federal Government or serving the Federal Government as an adviser or consultant.
- (h)There is extraterritorial Federal jurisdiction over an offense under this section.
- (i)A prosecution under this section or <u>section 1503</u> may be brought in the district in which the official proceeding (whether or not pending or about to be instituted) was intended to be affected or in the district in which the conduct constituting the alleged offense occurred.
- (j)If the offense under this section occurs in connection with a trial of a criminal case, the maximum term of imprisonment which may be imposed for the offense shall be the higher

of that otherwise provided by law or the maximum term that could have been imposed for any offense charged in such case.

- (k) Whoever conspires to commit any offense under this section shall be subject to the same penalties as those prescribed for the offense the commission of which was the object of the conspiracy.
- 42. Wes Haskett, Cliff Ogburn, Philip Hornthal, Lauren Womble, Jay Wheless and the Planning Board/Board of Adjustments are in violation of 18 U.S. Code § 1512 Tampering with a witness, victim, or an informant laws.
- 43. HREM Law Firm is involved with interfering with Applicant filing documents with the Planning Board/Board of Adjustments in October, 2024.
- 44. HREM Law Firm is involved with preventing police reports from being filed against Wes Haskett, even after Philip Hornthal said the police report could be provided to Philip Hornthal for filing (but a public records proves the police reports were never filed as Philip Hornthal claimed was occurring).
- 45. HREM Law Firm is involved with helping Cliff Ogburn prevent Applicant from obtaining the Southern Shores Newsletter email list for the purpose of notifying property owners that Southern Shores claims to have taken the right to subdivide from property owners without notifying property owners pursuant to Town Code 36-414(b) and without ordering a property tax reduction for devaluing property(s).
- 46. Town Code Section 22-1 states:

Any person who shall do or engage in any of the following shall be guilty of disorderly conduct:

- (8) Frequent any public place and obtain money from another by an illegal and fraudulent scheme, trick, artifice or device, or attempt to do so.
- 47. Southern Shores Town Planning Board/ Board of Adjustments, Town Office Employee Wes Haskett and Southern Shores paid attorneys are all quilty of disorderly conduct at the October 21, 2024 Variance Hearing for their fraudulent scheme to misrepresent Town Code 36-414(b). Southern Shores Planning Board will be guilty of another count of disorderly conduct on March 19, 2025 (about 6 months after they aided Wes Haskett's fraud at the Variance hearing) when they aid Wes Haskett's fraud again, which currently involves being in contempt of a Dare County Superior Court Order requiring a complete copy of the Variance hearing to be provided to the court within 30 days of December 18, 2024. Applicant is being forced to pay for Applications, Appeals and a Variance and has yet to have Southern Shores Town make a decision not based on an illegal, fraudulent scheme. Wes Haskett, Cliff Ogburn and the Planning Board's use of Southern Shores Town money to misrepresent 36-414(b) with claims that posted notice is not required for zoning amendments rezoning subdividable property to unsubdividable property when the code clearly states that in addition to 36-414(a) posted notice is required also violates embezzlement laws. Applicant's filing fees for subdivision denials based on illegally adopted zoning codes were \$200, \$350 for the Variance hearing, \$200 for the Variance Appeal, \$100 for the January 6, 2025 subdivision application and \$350 for the February 14, 2025 Appeal of the January 21, 2025 Subdivision Denial. Wes Haskett has knowingly committed \$1200 worth of false pre-tense theft crimes against Applicant by collecting filing fees and opposing applications with code he knows is based on fraud because Town Code 36-414(b) posted notice requirements were not complied with. Wes Haskett was also notified prior to the October 21, 2024 Variance hearing that Applicant has filed a fraud insurance claim against the Town of Southern Shores, specifically Wes Haskett and the Variance documents were going to be a part of the insurance investigation. Wes

Haskett refused to correct his false statements regarding Town Code 36-414(b) being complied with and encouraged the attorneys and Planning Board members to contribute to his fraudulent misrepresentations.

WHEREFORE, Applicant Anthony S Mina respectfully requests that the March 19, 2025 Hearing is Precluded because of the proof of a criminal conspiracy against Applicant and an Order granting the January 6, 2025 lot subdivision is entered.

March 16, 2025

Respectfully Submitted,